

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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	:	
In re Terrorist Attacks on September 11, 2001	:	03 MD 1570 (RCC)
	:	ECF Case
	:	
_____	X	

This document relates to: *Thomas E. Burnett, SR, et al.*
v. Al Baraka Investment and Development Corp., et
al., 03 cv 09849 (RCC)

**DEFENDANT INTERNATIONAL ISLAMIC RELIEF ORGANIZATION'S ANSWER
TO PLAINTIFF'S THIRD AMENDED COMPLAINT**

Defendant International Islamic Relief Organization ("IIRO"), through undersigned counsel, and pursuant to Rule 12, Fed. R. Civ. P., hereby submits its Answer to the Plaintiffs' Third Amended Complaint ("Complaint").

JURISDICTION AND VENUE

1. IIRO denies that this court has subject matter jurisdiction over IIRO.
2. IIRO denies that denies that the allegations in paragraph 2 fall within the exceptions to jurisdictional immunity.
3. IIRO denies that venue is proper in this district.

PARTIES

4. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 4.

FACTUAL ALLEGATIONS AGAINST DEFENDANTS

BACKGROUND

5. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 5.

6. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 6.
7. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 7.
8. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 8.
9. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 9.
10. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 10.
11. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 11.
12. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 12.
13. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 13.
14. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 14.
15. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 15.
16. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 16.

17. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 17.

The Hamburg al Qaeda Cell

18. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 18.

19. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 19.

20. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 20.

21. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 21.

22. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 22.

23. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 23.

24. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 24.

25. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 25.

26. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 26.

27. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 27.

28. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 28.
29. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 29.
30. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 30.
31. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 31.
32. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 32.
33. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 33.
34. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 34.
35. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 35.
36. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 36.
37. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 37.
38. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 38.

39. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 39.

The Banking Defendants

The Islamic Banking System and its Role in International Terrorism

40. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 40.

41. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 41.

42. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 42.

43. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 43.

44. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 44.

45. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 45.

46. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 46.

Al Baraka Investment and Development Corporation

47. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 47.

48. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 48.

49. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 49.

50. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 50.

51. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 51.

52. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 52.

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56. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 56.

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64. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 64.

65. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 65.

66. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 66.

Al Shamal Islamic Bank

67. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 67.

68. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 68.

69. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 69.

70. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 70.

71. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 71.

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80. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 80.

81. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 81.

82. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 82.

83. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 83.

Al-Rahji Banking and Investment Corporation

84. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 84.

85. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 85.

86. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 86.

87. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 87.

National Commerce Bank

88. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 88.

89. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 89.

90. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 90.

91. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 91.

92. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 92.

93. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 93.

94. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 94.

95. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 95.

96. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 96.

Dar al Maal al Islami

97. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 97.

98. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 98.

99. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 99.

Faisal Islamic Bank - Sudan

100. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 100.

101. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 101.

102. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 102.

Al Barakaat Exchange LLC

103. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 103.

104. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 104.

105. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 105.

106. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 106.

Tadamon Islamic Bank

107. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 107.

108. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 108.

109. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 109.

110. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 110.

Dubai Islamic Bank

111. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 111.

112. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 112.

113. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 113.

114. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 114.

115. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 115.

116. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 116.

117. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 117.

118. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 118.

119. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 119.

120. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 120.

121. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 121.

122. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 122.

123. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 123.

Bank al-Taqwa Limited

124. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 124.

125. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 125.

126. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 126.

127. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 127.

128. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 128.

129. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 129.

130. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 130.

131. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 131.

132. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 132.

133. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 133.

134. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 134.

135. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 135.

136. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 136.

137. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 137.

Arab Bank, PLC

138. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 138.

139. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 139.

Saudi American Bank

140. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 140.

141. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 141.

142. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 142.

143. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 143.

144. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 144.

145. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 145.

146. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 146.

147. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 147.

148. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 148.

149. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 149.

THE CHARITY DEFENDANTS

The Charity Fronts of Terror

150. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 150.

151. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 151.

152. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 152.

153. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 153.

Al-Haramain Islamic Foundation, Inc.

154. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 154.

155. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 155.

156. IIRO denies the allegations in paragraph 156 insofar as they relate to IIRO.

157. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 157.

Al-Haramain's Humanitarian Efforts Used to Conceal Support for al Qaeda

158. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 158.

159. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 159.

160. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 160.

161. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 161.

162. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 162.

163. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 163.

164. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 164.

165. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 165.

166. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 166.

Al-Haramain's Ties to al Qaeda's 1998 United States Embassy Bombings

167. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 167.

168. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 168.

169. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 169.

170. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 170.

171. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 171.

172. IIRO denies the allegations in paragraph 172 insofar as they relate to IIRO.

173. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 173.

174. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 174.

175. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 175.

**Al Haramain role in funding international terrorism is ongoing
and demonstrates a pattern of conduct**

176. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 176.

177. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 177.

178. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 178.

179. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 179.

Benevolence International Foundation Inc.

180. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 180.

181. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 181.

182. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 182.

183. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 183.

184. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 184.

185. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 185.

186. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 186.

187. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 187.

188. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 188.

189. IIRO denies the allegations in paragraph 189 insofar as they relate to IIRO.

190. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 190.

191. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 191.

192. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 192.

193. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 193.

194. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 194.

195. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 195.

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201. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 201.

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211. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 211.

212. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 212.

213. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 213.

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215. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 215.

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219. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 219.

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222. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 222.

223. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 223.

224. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 224.

225. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 225.

226. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 226.

227. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 227.

228. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 228.

World Assembly of Muslim Youth

229. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 229.

230. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 230.

231. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 231.

232. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 234.

233. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 233.

International Islamic Relief Organization

234. IIRO denies the allegations of paragraph 234.

235. IIRO denies the allegations of paragraph 235.

236. IIRO denies the allegations of paragraph 236.

237. IIRO denies the allegations of paragraph 237.

238. IIRO denies the allegations of paragraph 238.

239. IIRO denies the allegations of paragraph 239.

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242. IIRO denies the allegations of paragraph 242.

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244. IIRO denies the allegations of paragraph 244.

245. IIRO denies the allegations of paragraph 245.

246. IIRO denies the allegations of paragraph 246.

247. IIRO denies the allegations of paragraph 247.

248. IIRO denies the allegations of paragraph 248.

The Muslim World League

249. IIRO denies the allegations of paragraph 249 insofar as they relate to IIRO.

250. IIRO denies the allegations of paragraph 250 insofar as they relate to IIRO.

251. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 251.

252. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 252.

253. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 253.

254. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 254.

255. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 255.

256. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 256.

257. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 257.

258. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 258.

259. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 259.

260. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 260.

The SAAR Foundation

261. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 261.

262. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 262.

263. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 263.

264. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 264.

265. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 265.

266. IIRO denies the allegations of paragraph 266 insofar as they relate to IIRO.

267. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 267.

Rabita Trust

268. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 268.

269. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 269.

270. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 270.

271. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 271.

272. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 272.

273. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 273.

274. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 274.

275. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 275.

The Global Relief Foundation

276. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 276.

277. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 277.

278. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 278.

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291. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 291.

292. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 292.

293. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 293.

294. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 294.

295. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 295.

Taibah International Aid Association

296. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 296.

297. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 297.

298. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 298.

299. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 299.

300. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 300.

301. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 301.

302. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 302.

303. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 303.

304. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 304.

305. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 305.

306. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 306.

307. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 307.

308. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 308.

Saudi Binladin Group

309. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 309.

310. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 310.

311. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 311.

312. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 312.

313. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 313.

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318. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 318.

319. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 319.

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323. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 323.

324. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 324.

325. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 325.

326. IIRO denies the allegations of paragraph 326 insofar as they relate to IIRO.

327. IIRO denies the allegations of paragraph 327 insofar as they relate to IIRO.

328. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 328.

329. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 329.

Yassin Abdullah al-Kadi and Muwaffaq

330. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 330.

331. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 331.

332. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 332.

333. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 333.

334. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 334.

335. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 335.

336. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 336.

337. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 337.

338. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 338.

Certain Members of the Saudi Royal Family, and Related Persons

339. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 339.

340. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 340.

341. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 341.

342. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 342.

343. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 343.

344. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 344.

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346. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 346.

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351. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 351.

352. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 352.

353. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 353.

354. IIRO denies the allegations of paragraph 354 insofar as they relate to IIRO.

355. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 355.

356. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 356.

357. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 357.

358. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 358.

359. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 359.

360. IIRO denies the allegations of paragraph 360 insofar as they relate to IIRO.

361. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 361.

362. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 362.

363. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 363.

364. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 364.

365. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 365.

366. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 366.

367. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 367.

368. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 368.

369. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 369.

370. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 370.

371. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 371.

372. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 372.

373. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 373.

374. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 374.

375. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 375.

376. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 376.

377. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 377.

378. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 378.

379. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 379.

380. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 380.

381. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 381.

382. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 382.

383. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 383.

384. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 384.

385. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 385.

386. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 386.

387. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 387.

388. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 388.

389. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 389.

390. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 390.

391. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 391.

392. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 392.

393. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 393.

394. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 394.

395. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 395.

396. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 396.

397. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 397.

398. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 398.

399. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 399.

400. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 400.

401. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 401.

402. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 402.

403. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 403.

404. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 404.

405. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 405.

406. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 406.

407. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 407.

408. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 408.

409. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 409.

410. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 410.

411. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 411.

412. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 412.

413. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 413.

414. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 414.

415. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 415.

416. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 416.

417. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 417.

418. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 418.

419. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 419.

420. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 420.

421. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 421.

422. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 422.

423. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 423.

424. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 424.

425. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 425.

426. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 426.

427. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 427.

428. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 428.

429. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 429.

430. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 430.

431. IIRO denies the allegations of paragraph 431 insofar as they relate to IIRO.

432. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 432.

Delta Oil Company

433. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 433.

434. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 434.

435. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 435.

436. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 436.

437. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 437.

438. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 438.

439. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 439.

440. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 440.

441. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 441.

442. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 442.

NIMIR LLC

443. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 443.

444. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 444.

445. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 445.

446. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 446.

447. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 447.

448. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 448.

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450. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 450.

451. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 451.

452. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 452.

453. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 453.

454. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 454.

455. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 455.

Ary Gold LTD

456. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 456.

457. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 457.

458. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 458.

459. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 459.

460. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 460.

461. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 461.

462. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 462.

463. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 463.

464. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 464.

465. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 465.

466. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 466.

467. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 467.

468. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 468.

The Republic of Sudan

469. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 469.

470. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 470.

471. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 471.

472. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 472.

473. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 473.

474. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 474.

475. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 475.

476. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 476.

477. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 477.

478. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 478.

479. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 479.

480. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 480.

481. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 481.

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484. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 484.

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486. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 486.

487. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 487.

488. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 488.

489. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 489.

490. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 490.

491. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 491.

492. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 492.

493. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 493.

494. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 494.

495. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 495.

496. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 496.

497. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 497.

The Agencies and Instrumentalities of the Republic of Sudan

498. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 498.

499. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 499.

500. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 500.

501. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 501.

The Saudi – Spanish – German al Qaeda Scheme

502. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 502.

503. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 503.

504. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 504.

505. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 505.

506. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 506.

507. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 507.

508. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 508.

509. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 509.

510. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 510.

511. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 511.

512. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 512.

513. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 513.

514. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 514.

515. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 515.

516. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 516.

517. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 517.

518. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 518.

519. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 519.

520. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 520.

521. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 521.

522. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 522.

523. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 523.

524. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 524.

525. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 525.

526. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 526.

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529. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 529.

530. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 530.

531. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 531.

532. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 532.

533. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 533.

534. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 534.

535. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 535.

536. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 536.

537. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 537.

538. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 538.

539. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 539.

540. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 540.

541. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 541.

542. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 542.

Abu Qatada al-Filistini

543. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 543.

544. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 544.

545. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 545.

546. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 546.

547. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 547.

548. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 548.

549. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 549.

Mohammed Hussein al-Amoudi

550. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 550.

551. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 551.

552. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 552.

553. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 553.

Yassir al-Sirri

554. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 554.

555. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 555.

556. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 556.

557. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 557.

558. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 558.

559. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 559.

560. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 560.

**The Advice and Reformation Committee (ARC) and
The Committee for the Defense of Legitimate Rights (CDLR)**

561. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 561.

562. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 562.

563. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 563.

564. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 564.

565. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 565.

566. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 566.

567. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 567.

568. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 568.

569. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 569.

570. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 570.

571. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 571.

572. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 572.

573. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 573.

574. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 574.

575. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 575.

576. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 576.

577. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 577.

578. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 578.

579. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 579.

580. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 580.

581. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 581.

582. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 582.

583. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 583.

584. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 584.

585. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 585.

Islamic Cultural Center of Milan/Islamic Cultural Center of Geneva

586. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 586.

587. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 587.

588. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 588.

589. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 589.

590. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 590.

591. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 591.

592. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 592.

593. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 593.

594. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 594.

595. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 595.

596. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 596.

597. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 597.

598. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 598.

599. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 599.

600. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 600.

601. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 601.

602. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 602.

603. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 603.

604. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 604.

605. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 605.

606. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 606.

607. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 607.

608. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 608.

609. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 609.

610. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 610.

611. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 611.

612. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 612.

Mercy International Relief Agency

613. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 613.

614. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 614.

615. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 615.

616. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 616.

617. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 617.

618. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 618.

619. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 619.

620. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 620.

621. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 621.

622. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 622.

623. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 623.

Laundering of al Qaeda Funds Through Diamond Businesses

624. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 624.

625. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 625.

626. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 626.

627. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 627.

628. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 628.

629. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 629.

630. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 630.

Additional Defendants

631. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 631.

632. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 632.

633. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 633.

634. IIRO does not possess sufficient information to admit or deny the allegations in paragraph 634.

CLAIMS

COUNT ONE FOREIGN SOVEREIGN IMMUNITIES ACT

635. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

636. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

637. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

638. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

639. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

640. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

COUNT TWO
TORTURE VICTIM PROTECTION ACT

641. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

642. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

643. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

644. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

COUNT THREE
18 U.S.C. § 2331 (2331 et. seq.) et. seq.

645. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

646. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

647. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

648. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

649. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

650. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

651. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

652. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

COUNT FOUR
ALIEN TORT CLAIMS ACT

653. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

654. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

655. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

656. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

657. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

COUNT FIVE
WRONGFUL DEATH

658. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

659. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

660. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

661. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

662. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

663. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

664. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

COUNT SIX
NEGLIGENCE

665. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

666. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

667. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

COUNT SEVEN
SURVIVAL

668. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

669. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

670. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

COUNT EIGHT
NEGLIGENT AND/OR INTENTIONAL INFLICTION OF
EMOTIONAL DISTRESS

671. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

672. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

673. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

674. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

675. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

676. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

COUNT NINE
CONSPIRACY

677. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

678. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

679. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

680. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

681. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

682. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

COUNT TEN
AIDING AND ABETTING

683. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

684. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

685. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

686. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

687. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

688. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

COUNT ELEVEN
**VIOLATION OF THE RACKETEER INFLUENCED
AND CORRUPT ORGANIZATIONS ACT**

18 U.S.C. § 1962(a)

689. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

690. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

691. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

692. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

693. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

694. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

695. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

696. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

697. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

698. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

COUNT TWELVE
VIOLATION OF THE RACKETEER INFLUENCED
AND CORRUPT ORGANIZATIONS ACT

18 U.S.C. § 1962(c)

699. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

700. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

701. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

702. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

703. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

704. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

705. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

706. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

COUNT THIRTEEN
VIOLATION OF RACKETEER INFLUENCED
AND CORRUPT ORGANIZATIONS ACT
18 U.S.C. § 1962(d)

707. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

708. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

709. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

710. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

711. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

712. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

713. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

714. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

COUNT FOURTEEN
PUNITIVE DAMAGES

715. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

716. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

717. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

COUNT FIFTEEN

**PUNITIVE DAMAGES – AGENCIES AND INSTRUMENTALITIES
OF THE FOREIGN STATE DEFENDANT**

718. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

719. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

720. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

721. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

722. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

Common Issues Requiring Consolidation

723. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

FIRST AFFIRMATIVE DEFENSE

(Failure to State a Claim)

Plaintiffs' claims fail to state a claim against IIRO for which relief may be granted.

SECOND AFFIRMATIVE DEFENSE

(Causation)

There is no causal connection between any of IIRO's activities and plaintiffs' injuries.

THIRD AFFIRMATIVE DEFENSE

(Causation)

No act or omission of any agent, servant, or employee of IIRO proximately caused any harm or damages to plaintiffs.

FOURTH AFFIRMATIVE DEFENSE

(Other Tortfeasors)

Plaintiffs' damages and injuries were caused by other individuals or entities who are, or are not, named as parties to this action.

FIFTH AFFIRMATIVE DEFENSE

(Improper Venue)

This Court is not the proper venue for plaintiffs' claims against IIRO.

SIXTH AFFIRMATIVE DEFENSE

(Subject Matter Jurisdiction)

This Court does not have subject matter jurisdiction over plaintiffs' claims against IIRO.

SEVENTH AFFIRMATIVE DEFENSE

The Central Intelligence Agency, The Federal Bureau of Investigation, and other agencies of the United States government had information and resources to prevent the September 11, 2001, attacks from occurring. But for their failure to utilize this information and these resources, MWL would not be a named defendant in this action.

EIGHTH AFFIRMATIVE DEFENSE

(Personal Jurisdiction)

This Court does not have personal jurisdiction over plaintiffs' claims against IIRO.

NINTH AFFIRMATIVE DEFENSE

(Estoppel)

Plaintiffs are estopped from receiving the relief requested against IIRO.

TENTH AFFIRMATIVE DEFENSE

(Statute of Limitations)

Plaintiffs' claims against IIRO are barred, in whole or in part, by the applicable statute of limitations.

ELEVENTH AFFIRMATIVE DEFENSE

(Punitive Damages)

Plaintiffs' claims for punitive damages against IIRO are barred because IIRO's activities, as alleged by plaintiffs, were not committed with intent, malice, willful and outrageous conduct aggravated by evil motive, or reckless indifference, and none of IIRO's activities in any way were intended to, or did harm, the plaintiffs in this action.

TWELFTH AFFIRMATIVE DEFENSE

(No Double Recovery)

Plaintiffs' claims for compensatory and punitive damages are barred to the extent that some plaintiffs are also seeking recovery against IIRO, for the same or similar claims, in the civil actions comprising the multi-district entitled *In re Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (RCC), pending in the United States District Court for the Southern District of New York.

THIRTEENTH AFFIRMATIVE DEFENSE

(Immunity)

IIRO is an instrumentality of the government of the Kingdom of Saudi Arabia. Accordingly, IIRO is immune from suit.

FOURTEENTH AFFIRMATIVE DEFENSE

In response to plaintiffs' claims, IIRO intends to invoke any other defenses, including, affirmative defenses, as they may become apparent through discovery, and reserve the right, in accordance with the Federal Rules of Civil Procedure and the Local Civil Rules of the United States District Court for the District of Columbia, to assert such defenses.

WHEREFORE, IIRO requests that the Plaintiffs' Third Amended Complaint be dismissed with prejudice as to IIRO, and the Court award attorney's fees and costs to IIRO in defending this case with no factual or legal basis against IIRO, and award any other relief that the Court deems just under the circumstances.

Respectfully submitted,

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